

EXHIBIT D

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

IMMERSION CORPORATION,

Plaintiff,

v.

**SAMSUNG ELECTRONICS AMERICA, INC.;
SAMSUNG ELECTRONICS CO., LTD.**

Defendants.

Civil Action No 2:17-cv-572-JRG

**IMMERSION CORPORATION'S PATENT RULE 3-1
DISCLOSURE OF ASSERTED CLAIMS AND INFRINGEMENT CONTENTIONS**

Plaintiff Immersion Corporation ("Immersion") hereby makes its Disclosure of Asserted Claims and Infringement Contentions under Patent Rule 3-1 against Defendants Samsung Electronics America, Inc., and Samsung Electronics Co., Ltd. (collectively, "Samsung"). Additionally, under Patent Rule 3-2, Immersion is producing documents bearing production numbers IMMR_SEC0000001 - IMMR_SEC0008623.

Immersion's investigation into the extent of Samsung's infringement is ongoing, and the following disclosures are based solely on the information currently available to Immersion. Immersion has not yet had the ability to review Samsung's source code for any of the accused devices, or to take any discovery regarding the accused devices' construction and operation. Immersion reserves the right to supplement or modify these disclosures as new information becomes available, whether through discovery or otherwise.

Samsung—such as technical manuals, design specifications, advertising, instructions for use, or source code—that may affect the substance of Immersion’s disclosure of asserted claims.

Immersion reserves the right to supplement, amend, or otherwise modify its identification of asserted claims based on its review of the relevant documentation and continued investigation.

B. Patent Rule 3-1(b) – Accused Instrumentalities

Based on Immersion’s investigation thus far, the Accused Instrumentalities include all touch screen mobile phones that were made, used, sold or offered for sale in the United States and/or imported into the United States by Samsung or any other entity within the limitations period prescribed by 35 U.S.C. § 286, and which Samsung had not commenced commercially producing, distributing, and selling before January 1, 2016. Immersion has made reasonable efforts to determine the precise model names of Samsung touch screen mobile phones that satisfy the above criteria and to determine which specific claims each model infringes. Samsung, however, is best positioned to know which models of its phones were not commercially produced, distributed, and sold before January 1, 2016, and Immersion reserves the right to supplement this list of Accused Instrumentalities based on information learned at a later date in this case, whether through discovery or otherwise. Based on Immersion’s investigation to date, Immersion identifies the following Accused Instrumentalities as infringing the Asserted Claims on a claim-by-claim basis:

'846 patent claim 1	<ul style="list-style-type: none"> • Samsung Galaxy S8 • Samsung Galaxy S8+ • Samsung Galaxy S8 Active • Samsung Galaxy Note 8
---------------------	--

	<ul style="list-style-type: none"> • Samsung Galaxy S7 • Samsung Galaxy S7 Edge • Samsung Galaxy Grand Prime • Samsung Galaxy J7 Sky Pro 4G • Samsung Galaxy J7 Perx • Samsung Galaxy J7 V • Samsung Galaxy J7 • Samsung Galaxy J3 Eclipse • Samsung Galaxy J3 Emerge • Samsung Galaxy J3
'846 patent claim 7	<ul style="list-style-type: none"> • Samsung Galaxy S8 • Samsung Galaxy S8+ • Samsung Galaxy S8 Active • Samsung Galaxy Note 8 • Samsung Galaxy S7 • Samsung Galaxy S7 Edge • Samsung Galaxy Grand Prime • Samsung Galaxy J7 Sky Pro 4G • Samsung Galaxy J7 Perx • Samsung Galaxy J7 V • Samsung Galaxy J7 • Samsung Galaxy J3 Eclipse

	<ul style="list-style-type: none"> • Samsung Galaxy J3 Emerge • Samsung Galaxy J3
'846 patent claim 16	<ul style="list-style-type: none"> • Samsung Galaxy S8 • Samsung Galaxy S8+ • Samsung Galaxy S8 Active • Samsung Galaxy Note 8 • Samsung Galaxy S7 • Samsung Galaxy S7 Edge • Samsung Galaxy Grand Prime • Samsung Galaxy J7 Sky Pro 4G • Samsung Galaxy J7 Perx • Samsung Galaxy J7 V • Samsung Galaxy J7 • Samsung Galaxy J3 Eclipse • Samsung Galaxy J3 Emerge • Samsung Galaxy J3
'846 patent claim 18	<ul style="list-style-type: none"> • Samsung Galaxy S8 • Samsung Galaxy S8+ • Samsung Galaxy S8 Active • Samsung Galaxy Note 8 • Samsung Galaxy S7 • Samsung Galaxy S7 Edge

	<ul style="list-style-type: none"> • Samsung Galaxy Grand Prime • Samsung Galaxy J7 Sky Pro 4G • Samsung Galaxy J7 Perx • Samsung Galaxy J7 V • Samsung Galaxy J7 • Samsung Galaxy J3 Eclipse • Samsung Galaxy J3 Emerge • Samsung Galaxy J3
'846 patent claim 19	<ul style="list-style-type: none"> • Samsung Galaxy S8 • Samsung Galaxy S8+ • Samsung Galaxy S8 Active • Samsung Galaxy Note 8 • Samsung Galaxy S7 • Samsung Galaxy S7 Edge • Samsung Galaxy Grand Prime • Samsung Galaxy J7 Sky Pro 4G • Samsung Galaxy J7
'288 patent claim 18	<ul style="list-style-type: none"> • Samsung Galaxy S8 • Samsung Galaxy S8+ • Samsung Galaxy S8 Active • Samsung Galaxy Note 8 • Samsung Galaxy S7

	<ul style="list-style-type: none"> • Samsung Galaxy S7 Edge • Samsung Galaxy Grand Prime • Samsung Galaxy J7 Sky Pro 4G • Samsung Galaxy J7 Perx • Samsung Galaxy J7 V • Samsung Galaxy J7 • Samsung Galaxy J3 Eclipse • Samsung Galaxy J3 Emerge • Samsung Galaxy J3
'720 patent claim 10	<ul style="list-style-type: none"> • Samsung Galaxy S8 • Samsung Galaxy S8+ • Samsung Galaxy S8 Active • Samsung Galaxy Note 8 • Samsung Galaxy S7 • Samsung Galaxy S7 Edge • Samsung Galaxy Grand Prime • Samsung Galaxy J7 Sky Pro 4G • Samsung Galaxy J7
'720 patent claim 13	<ul style="list-style-type: none"> • Samsung Galaxy S8 • Samsung Galaxy S8+ • Samsung Galaxy S8 Active • Samsung Galaxy Note 8

	<ul style="list-style-type: none"> • Samsung Galaxy S7 • Samsung Galaxy S7 Edge • Samsung Galaxy Grand Prime • Samsung Galaxy J7 Sky Pro 4G • Samsung Galaxy J7
'720 patent claim 15	<ul style="list-style-type: none"> • Samsung Galaxy S8 • Samsung Galaxy S8+ • Samsung Galaxy S8 Active • Samsung Galaxy Note 8 • Samsung Galaxy S7 • Samsung Galaxy S7 Edge • Samsung Galaxy Grand Prime • Samsung Galaxy J7 Sky Pro 4G • Samsung Galaxy J7
'720 patent claim 16	<ul style="list-style-type: none"> • Samsung Galaxy S8 • Samsung Galaxy S8+ • Samsung Galaxy S8 Active • Samsung Galaxy Note 8 • Samsung Galaxy S7 • Samsung Galaxy S7 Edge • Samsung Galaxy Grand Prime • Samsung Galaxy J7 Sky Pro 4G

	<ul style="list-style-type: none"> • Samsung Galaxy J7
'720 patent claim 19	<ul style="list-style-type: none"> • Samsung Galaxy S8 • Samsung Galaxy S8+ • Samsung Galaxy S8 Active • Samsung Galaxy Note 8 • Samsung Galaxy S7 • Samsung Galaxy S7 Edge • Samsung Galaxy Grand Prime • Samsung Galaxy J7 Sky Pro 4G • Samsung Galaxy J7
'181 patent claim 1	<ul style="list-style-type: none"> • Samsung Galaxy S8 • Samsung Galaxy S8+ • Samsung Galaxy S8 Active • Samsung Galaxy Note 8 • Samsung Galaxy S7 • Samsung Galaxy S7 Edge • Samsung Galaxy Grand Prime • Samsung Galaxy J7 Sky Pro 4G • Samsung Galaxy J7
'181 patent claim 2	<ul style="list-style-type: none"> • Samsung Galaxy S8 • Samsung Galaxy S8+ • Samsung Galaxy S8 Active

	<ul style="list-style-type: none"> • Samsung Galaxy Note 8 • Samsung Galaxy S7 • Samsung Galaxy S7 Edge • Samsung Galaxy Grand Prime • Samsung Galaxy J7 Sky Pro 4G • Samsung Galaxy J7
'181 patent claim 3	<ul style="list-style-type: none"> • Samsung Galaxy S8 • Samsung Galaxy S8+ • Samsung Galaxy S8 Active • Samsung Galaxy Note 8 • Samsung Galaxy S7 • Samsung Galaxy S7 Edge • Samsung Galaxy Grand Prime • Samsung Galaxy J7 Sky Pro 4G • Samsung Galaxy J7
'181 patent claim 8	<ul style="list-style-type: none"> • Samsung Galaxy S8 • Samsung Galaxy S8+ • Samsung Galaxy S8 Active • Samsung Galaxy Note 8 • Samsung Galaxy S7 • Samsung Galaxy S7 Edge • Samsung Galaxy Grand Prime

	<ul style="list-style-type: none"> • Samsung Galaxy J7 Sky Pro 4G • Samsung Galaxy J7
'181 patent claim 20	<ul style="list-style-type: none"> • Samsung Galaxy S8 • Samsung Galaxy S8+ • Samsung Galaxy S8 Active • Samsung Galaxy Note 8 • Samsung Galaxy S7 • Samsung Galaxy S7 Edge • Samsung Galaxy Grand Prime • Samsung Galaxy J7 Sky Pro 4G • Samsung Galaxy J7
'181 patent claim 21	<ul style="list-style-type: none"> • Samsung Galaxy S8 • Samsung Galaxy S8+ • Samsung Galaxy S8 Active • Samsung Galaxy Note 8 • Samsung Galaxy S7 • Samsung Galaxy S7 Edge • Samsung Galaxy Grand Prime • Samsung Galaxy J7 Sky Pro 4G • Samsung Galaxy J7
'332 patent claim 1	<ul style="list-style-type: none"> • Samsung Galaxy S8 • Samsung Galaxy S8+

	<ul style="list-style-type: none"> • Samsung Galaxy S8 Active • Samsung Galaxy Note 8 • Samsung Galaxy S7 • Samsung Galaxy S7 Edge • Samsung Galaxy Grand Prime • Samsung Galaxy J7 Sky Pro 4G • Samsung Galaxy J7 Perx • Samsung Galaxy J7 V • Samsung Galaxy J7 • Samsung Galaxy J3 Eclipse • Samsung Galaxy J3 Emerge • Samsung Galaxy J3
'332 patent claim 2	<ul style="list-style-type: none"> • Samsung Galaxy S8 • Samsung Galaxy S8+ • Samsung Galaxy S8 Active • Samsung Galaxy Note 8 • Samsung Galaxy S7 • Samsung Galaxy S7 Edge • Samsung Galaxy Grand Prime • Samsung Galaxy J7 Sky Pro 4G • Samsung Galaxy J7 Perx • Samsung Galaxy J7 V

	<ul style="list-style-type: none"> • Samsung Galaxy J7 • Samsung Galaxy J3 Eclipse • Samsung Galaxy J3 Emerge • Samsung Galaxy J3
'332 patent claim 3	<ul style="list-style-type: none"> • Samsung Galaxy S8 • Samsung Galaxy S8+ • Samsung Galaxy S8 Active • Samsung Galaxy Note 8 • Samsung Galaxy S7 • Samsung Galaxy S7 Edge • Samsung Galaxy Grand Prime • Samsung Galaxy J7 Sky Pro 4G • Samsung Galaxy J7 Perx • Samsung Galaxy J7 V • Samsung Galaxy J7 • Samsung Galaxy J3 Eclipse • Samsung Galaxy J3 Emerge • Samsung Galaxy J3
'332 patent claim 4	<ul style="list-style-type: none"> • Samsung Galaxy S8 • Samsung Galaxy S8+ • Samsung Galaxy S8 Active • Samsung Galaxy Note 8

	<ul style="list-style-type: none"> • Samsung Galaxy S7 • Samsung Galaxy S7 Edge • Samsung Galaxy Grand Prime • Samsung Galaxy J7 Sky Pro 4G • Samsung Galaxy J7 Perx • Samsung Galaxy J7 V • Samsung Galaxy J7 • Samsung Galaxy J3 Eclipse • Samsung Galaxy J3 Emerge • Samsung Galaxy J3
'332 patent claim 5	<ul style="list-style-type: none"> • Samsung Galaxy S8 • Samsung Galaxy S8+ • Samsung Galaxy S8 Active • Samsung Galaxy Note 8 • Samsung Galaxy S7 • Samsung Galaxy S7 Edge • Samsung Galaxy Grand Prime • Samsung Galaxy J7 Sky Pro 4G • Samsung Galaxy J7 Perx • Samsung Galaxy J7 V • Samsung Galaxy J7 • Samsung Galaxy J3 Eclipse

	<ul style="list-style-type: none"> • Samsung Galaxy J3 Emerge • Samsung Galaxy J3
'332 patent claim 6	<ul style="list-style-type: none"> • Samsung Galaxy S8 • Samsung Galaxy S8+ • Samsung Galaxy S8 Active • Samsung Galaxy Note 8 • Samsung Galaxy S7 • Samsung Galaxy S7 Edge • Samsung Galaxy Grand Prime • Samsung Galaxy J7 Sky Pro 4G • Samsung Galaxy J7 Perx • Samsung Galaxy J7 V • Samsung Galaxy J7 • Samsung Galaxy J3 Eclipse • Samsung Galaxy J3 Emerge • Samsung Galaxy J3
'332 patent claim 7	<ul style="list-style-type: none"> • Samsung Galaxy S8 • Samsung Galaxy S8+ • Samsung Galaxy S8 Active • Samsung Galaxy Note 8 • Samsung Galaxy S7 • Samsung Galaxy S7 Edge

	<ul style="list-style-type: none"> • Samsung Galaxy Grand Prime • Samsung Galaxy J7 Sky Pro 4G • Samsung Galaxy J7 Perx • Samsung Galaxy J7 V • Samsung Galaxy J7 • Samsung Galaxy J3 Eclipse • Samsung Galaxy J3 Emerge • Samsung Galaxy J3
--	--

Immersion reserves the right to accuse additional products based on its review of Samsung's document production and continued investigation.

C. Patent Rule 3-1(c) – Claim Chart for the Accused Instrumentalities

Attached hereto as Exhibits 54 – 67 are claims charts that identify where each limitation of each asserted claim is found within each Accused Instrumentality based on the information available to Immersion. Immersion reserves the right to supplement or amend these claim charts based on document and information that become available at a later date, through discovery or otherwise, and based on the Court's claim construction rulings.

D. Patent Rule 3-1(d) – Nature of Infringement

Immersion asserts that each limitation of each asserted claim of each asserted patent is literally present in each Accused Instrumentality. To the extent that any limitation of any asserted claim is not found to have literal correspondence in any Accused Instrumentality, those limitations are present under the doctrine of equivalents. Additional details about Immersion's assertions can be found in Immersion's Patent Rule 3-1(c) Claim Charts, which are attached.